

THE ORGANIC SEAFOOD COUNCIL

(information)
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STATEMENT FROM THE ORGANIC SEAFOOD COUNCIL 2 (FINAL).DOC
November 3rd, 2006

To: The National Organic Standards Board

Re. :Response to the Invitation for Public Comment on Aquaculture Standards

Dear Board Members,

The Organic Seafood Council (in formation) is an industry association of producers, brokers, wholesalers, certifiers and other industry entities that have come together to allow us to speak with one voice on issues that concern us. These deliberations of your Board are of tremendous importance to our Council, and to the future of organic seafood.

OSC would like to offer the following response to the specific questions in the September 8th "Invitation for Comment ...".

Species or Production Method Specific Standards:

The Livestock Committee has stated the belief that "... one standard ... is appropriate ... except when absolutely necessary ...", and we would usually concur. However, Specific Standards may be "absolutely necessary" to address the concerns of several petitioners, who object to the establishment of Organic standards for so-called carnivorous fish, or for fish raised in net pens.

It has been proposed by some that you proceed with recommendations for herbivorous and omnivorous fish, but that you defer any recommendation on carnivorous fish. OSC would suggest that after all of the effort from the Working Group and the Board, the appropriate course of action would be to provide recommendations for all fish. The Board should address all issues, and make a single decision, without or delay. OSC feels that the proposal to only move on a non-carnivorous standard would delay the process for establishing standards for carnivorous species, and it is these fish that deliver the greater nutritional value to the consumer.

We are asking for standards that are demanding, rigorous, and measurable, and meet the expectations of Organic consumers. This is, after all, precisely what the Board does so well for terrestrial Organic agriculture. Specific standards can overcome many of the concerns that you have heard about finfish. For example:

- If there are concerns about escapes of farmed fish from net pens, the Board should recommend that certified Organic fish farms have reasonable, proven cage designs to minimize escapes, and/or only use native fish species and non-selected brood stock (to ensure that there is no genetic discrepancy between what is inside the cages and what is outside in the wild). If the broodstock have been selectively-bred, then the Organic fish farm must demonstrate a very low risk of escapes, and must demonstrate that any escapes will have no significant impact on wild populations or local ecosystem.
- If there are concerns about diseases in net pen culture, the Board should recommend standards for the welfare of the fish in Organic farms, so as to minimize the transfer of pathogens to wild stocks and limit the susceptibility of cultured stocks to sea borne pathogens. Surely such standards are already in place for welfare of terrestrial farmed animals.
- If there are valid concerns about effluents from Organic fish farms, the Board should recommend farm siting requirements to ensure adequate water flow through the net pens. This may include some measure of prevailing currents, water depth, distance from potentially impacted habitats, or some combination of these.
- If there are indeed concerns about benthic habitat impacts, then the Board should similarly recommend standards for minimum siting requirements and annual benthic surveys of Organic farms, and/or adopt single year-class crop rotation/fallowing as is presently in place under EU requirements.
- If the objections to so-called carnivorous fish culture are considered valid (though the realities of these objections are questioned, below), the Board should regulate the amount of fish oil in the diet of Organically-cultured fish as is in place under EU standards (fish oil inclusion rate at a maximum of 24%). This would prevent the deferral of a decision, as the Board could choose a maximum inclusion rate that is equitable, and achievable, and mandate ongoing improvement to reduce reliance on these fisheries.

Impact on the Environment:

One of the fundamentals of Organic culture is that animal wastes are simple nutrients that feed further productivity within the ecosystem. There is a growing body of evidence that the nutrient inputs from net pen culture of fish can have positive effects on benthic biomass and diversity within a broad area. Organic aquaculturists may even seek to utilize this nutrient source, by culturing filter-feeding bivalves or macroalgae in the waters around fish net pens. Oceanic productivity in tropical waters is usually nutrient-limited: fish farms may therefore increase productivity and biodiversity. Again, then, the issue becomes one of siting, to ensure that the net pens have net ecological benefits, rather than detriments. As stated above, OSC believes that these siting concerns should

be dealt with through production-method specific standards. It is patently ludicrous to state (as has much testimony to the Board) that net pen culture can never be considered Organic. Some net pen culture sites, systems or species could certainly meet reasonable, rigorous Organic requirements. The Board should identify these requirements, rather than excluding all net pen cultured fish from Organic status.

Differences between Organic and Conventional Aquaculture Standards:

Organic standards should provide assurances to consumers that Organically-cultured fish are grown in a manner consistent with the principles of humanness, healthfulness and sustainability. There are myriad ways that conventional aquaculture may not meet the expectations of Organic seafood consumers. By establishing Organic standards, the Board can encourage an aquaculture industry that meets and exceeds these expectations.

Use of Fish Meal and Fish Oil:

In the questions following his oral testimony to the Board, Neil Anthony Sims of Kona Blue, and a member of OSC, sought clarification from the National Organic Program as to whether fish meal and fish oil were approved for use in other Organic agriculture. It would be instructive to learn if fish by-products are used in Organic fertilizers, or Organic chicken, pig or cattle feeds. OSC would welcome some clarification on this point from the Board or NOP.

If fish meal and fish oil are indeed permitted in other Organic agricultural uses, then OSC would question the rationale for excluding it from – or severely restricting its use in – Organic fish diets. What’s good for the goose should certainly be good for the grouper ...

Many Organic standards and indeed, the recommendations of the Working Group; emphasize the importance of natural diets for Organic culture. Many fish are naturally piscivorous (rather than the more widely-used term ‘carnivorous’). Fish comprise their natural diet, and is essential to their health.

Many of the constituents in fish oils are also essential to good human nutrition, and fish represent the most effective way for these oils to be made available. By allowing the inclusion of fish meal and fish oil in the diets of Organically-cultured fish, the Board is ensuring that Organic consumers can obtain these essential oils in their most natural form, in a way that is ecologically efficient.

The Board may, in its wisdom, consider that the concerns over sustainability of forage fish fisheries justify some restriction on fish meal and fish oil use. Rather than precluding their use altogether, however, there would seem to be ample opportunity for the Board to establish reasonable restrictions on use of such products from well-managed fisheries.

Sources of Fish Meal and Fish Oil:

The Aquaculture Working Group Interim Report needs to clarify the specific uses of different sources of fish meal and fish oil. OSC believes that Organic standards should encourage the use of fish meal and fish oil that is derived from processing by-products of any certified Organic seafood. Similarly, the standards should also encourage unrestricted use of fish meal and fish oil derived from the processing by-products of any sustainably managed wild stock. This comports with the Organic principle of re-use and recycling of nutrients, and also allows diets to more closely resemble the animals' most natural food.

If NOSB decides to restrict the use of fish meal and fish oil from sustainably managed reduction fisheries (from forage fish such as Peruvian anchovies), then use of these substances should first be completely precluded in terrestrial Organic agriculture. Aquaculture diets optimize conservation of the valuable omega-3 fatty acids in fish meal and fish oil. Therefore, if these resources are considered to be so scarce as to need protection (when actually, many of these stocks are sustainably managed), then Organic aquaculture diets are the most effective use of them, and this use should be preferred over their use as dietary components in feeding terrestrial animals.

OSC recognizes that there is increasing pressure on the forage fish stocks, as world wide demand for fish meal and fish oil has increased. As aquaculture continues to scale, therefore, we must find alternatives. If there is any restriction on use of fish meal and fish oil, therefore, the initial restriction levels should be reasonably achievable, to ensure that Organically-farmed fish do not suffer nutritional deficiencies. Perhaps, with time, these minimum levels could be increased, to ensure long term sustainability of forage fish stocks, but there is no rationale for immediate imposition of arbitrary and unachievable inclusion rate targets.

In the interests of equity, restrictions on maximum levels of persistent organic pollutants (POPs) in fish meal and fish oil in Organic fish diets should only be applied to aquaculture if the NOP also imposes similar restrictions on POPs in other terrestrial agricultural animal diets.

Slaughter By-products in Aquaculture Feed:

OSC notes that the use of selected processing by-products from Organic poultry has recently been endorsed by some leading environmentalists. We welcome this flexibility in considering alternative feed constituents. Particularly if the Board decides to impose any restriction on fish meal and fish oil in Organic aquaculture, these sustainable, recyclable sources of proteins and oils will be increasingly important.

We agree that the US market is probably not ready for processing by-products of mammals, but if Organic poultry by-products are approved, then there is less need to consider ruminant by-products in Organic aquaculture feeds.

While the use of terrestrial animal processing by-products is universally prohibited in European Organic standards, OSC asks the Board to recognize that they are considering USDA Organic standards. If producers wish to export to Europe, then they already must obtain certification from that importing country. This other foreign certification process can address European concerns; the Board's recommendations should address the salient issues for U.S. Organic culture, and not focus on issues within other jurisdictions.

Signed :

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FOR: Organic Seafood Council, Steering Committee

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